

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

v.

FORTINET, INC.

Defendant.

Case No. 2:22-cv-00322-JRG-RSP  
(Lead Case)

**JURY TRIAL DEMANDED**

**JOINT MOTION TO CONTINUE TRIAL DATE**

Plaintiff Lionra Technologies Limited (“Lionra”) and Defendant Fortinet, Inc. (“Fortinet”) hereby file this joint motion to continue the June 24 trial date to the next available setting in view of pre-existing scheduling conflicts the week of June 24 of both of Fortinet’s experts as described below, and also to continue the June 12 pretrial conference and motion hearing.

Background. On Saturday, June 1, 2024, the Court set this case for trial the week of June 24, 2024. On June 5, 2024, the Court scheduled the pretrial conference for June 12, 2024 (Dkt. 541) and set a hearing on Fortinet’s motion for summary judgment of non-infringement (Dkt. 260) for the same date.

The June 24 Trial Date. Fortinet’s only technical expert, Dr. Kevin Almeroth (who will testify both on non-infringement and invalidity) is also a testifying expert in a case scheduled for trial before Judge Williams in the District of Delaware on June 24-28, 2024. *See* Ex. 1, Almeroth Declaration, at ¶ 5-6. Judge Williams set that case for trial in an Order on January 24, 2024. *Id.* Dr. Almeroth thus has a pre-existing conflict and will be unavailable for trial in the above-captioned case on June 24. *Id.*

Separately, Fortinet's damages expert, Ambreen Salters, scheduled a 10-day trip to Europe with her family, departing on June 25 and returning on July 7. *See* Ex. 2, Salters Declaration, at ¶ 5. Ms. Salters scheduled this trip shortly after the Court's May 2, 2024 Order continuing all pretrial deadlines and trial date in the above-captioned case, and it is therefore a pre-existing conflict. *Id.*

Fortinet submits that these experts are essential to Fortinet's defense in this matter, and that their absence from trial would unduly and irreparably prejudice Fortinet. In light of the facts described above, Lionra does not oppose Fortinet's request, and the parties jointly request that the Court continue the trial date to the next available setting.

The June 12 Pretrial Conference and Motion Hearing. The parties are in the process of scheduling a further mediation with Judge Folsom in view of the Court's Report and Recommendation dated June 6, 2024, Doc. 452, which the parties would like to complete before the pretrial conference in this case, if possible. If the Court grants the joint motion to continue the trial date, therefore, the parties respectfully request that the Court also continue the pretrial conference and the hearing on Fortinet's summary judgment motion.

A proposed Order is attached hereto.

Dated: June 7, 2024

Respectfully submitted,

*Counsel for Plaintiff*  
*Lionra Technologies Limited*

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the Parties met and conferred to discuss the substantive issues addressed in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ Melissa R. Smith

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on June 7, 2024.

/s/ Melissa R. Smith